

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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STEPHEN BECKMAN,  
Plaintiff,

v.

BULL HN INFORMATION SYSTEMS INC.,  
Defendant

C.A. No.: 03-CV-12567NG

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**DECLARATION OF NANCIE L. EDGREN IN SUPPORT OF PLAINTIFF'S MOTION  
FOR RECONSIDERATION TO COMPEL DEFENDANT, BULL HN INFORMATION  
SYSTEM INC.'S ANSWERS TO INTERROGATORIES AND PRODUCTION OF  
DOCUMENTS**

I, Nancie L. Edgren, hereby depose and state the following:

1. I am an associate at Barron and Stadfeld, P.C. and am involved in the firm's representation of the Plaintiff, Stephen Beckman, in the above matter.
2. Attached as Exhibit A are true and accurate copies of documents provided by Bull HN Information Systems Inc. during the course of discovery that purportedly reflect the titles and ages of layoffs of employees who worked in the manufacturing division in the Lawrence plant and whose notification date occurred in 1994 and 1995;
3. Attached as Exhibit B are true and accurate copies of documents provided by Bull HN Information Systems Inc. during the course of discovery that purportedly reflect the Manufacturing Division Layoffs with a notification date of December 16, 1994;
4. Attached as Exhibit C are true and accurate copies of documents provided by Bull HN Information Systems Inc. during the course of discovery that is an Affidavit of Cecile Wright, Vice President for Human Resources;
5. Attached as Exhibit D are true and accurate copies of excerpts from the Deposition of Stephen Beckman held on December 16, 2004;

6. Attached as Exhibit E are true and accurate copies of Plaintiff's Motion to Compel Defendant, Bull HN Information System Inc.'s Answers to Interrogatories and Production of Documents.

Respectfully submitted,  
The Plaintiff,  
By his attorneys,

/s/ Nancie L. Edgren  
Denise L. Page, Esq.  
BBO No. 119415  
Nancie L. Edgren, Esq.  
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Date: April 15, 2005